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March 25, 1999

Dockets Management Branch (HFA-395)
Food and Drug Administration 0943 '99 MAR 30 P2:07
5630 Fishers Lane, Room 1061
Rockville, MD 20852.

RE: Docket #98N-1038, "Irradiation in the production, processing and handling of food"

To Whom It May Concern,

In response to your ANPRM requesting public comment on whether revisions of the current labeling requirements for irradiated foods are needed and appropriate, I submit the following comments.

I believe that the FDA has a moral imperative to preserve and strengthen current labelling requirements for irradiated food. Prominent labeling, making use of the terms "irradiation" or "irradiated" and the radura logo, is the only way that consumers can be assured some basic level of information about the potential risks of the food they are buying and consuming. I am strongly opposed to terms such as "cold pasteurization" and "electronic pasteurization." These terms are vague and misleading and are clearly an attempt to sidetrack the many Americans who have legitimate concerns about irradiation of food. They should not be used.

Removing the requirement for clear and prominent labelling of irradiated food removes the ability of consumers to identify foods which have been exposed to radiation and which may subsequently undergone a loss of vitamins and changes in sensory and spoilage qualities that are not obvious or expected.

I believe that the current disclosure statements for irradiated food do not go far enough in protecting the public from potential health risks. At minimum these required statements should be preserved and the FDA should consider requiring stronger language.

I believe that irradiation is a misconceived approach to resolving food contamination problems that further endangers public health. Better food production, processing, and distribution practices would be a much better direction to pursue to *prevent* food contamination rather than relying on a dangerous technology to attempt to solve the problem.

Sincerely,

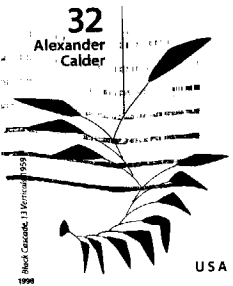
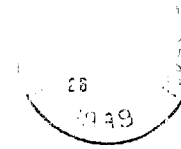

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98N-1038

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